

1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

Claude M. Stern (Bar No. 96737)

2 claudestern@quinnemanuel.com

Evette D. Pennypacker (Bar No. 203515)

3 evettepennypacker@quinnemanuel.com

Andrea Pallios Roberts (Bar No. 228128)

4 andreaproberts@quinnemanuel.com

555 Twin Dolphin Drive, Suite 560

5 Redwood Shores, California 94065-2139

Telephone: (650) 801-5000

6 Facsimile: (650) 801-5100

7 Attorneys for Defendants The Walt Disney
Company, Walt Disney Pictures, Disney Book
8 Group, LLC, Pixar, and Disney Enterprises, Inc.

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 OAKLAND DIVISION

12 Deborah J. Thomas,

13 Plaintiff,

14 vs.

15 The Walt Disney Company, Walt Disney
Studios, Disney Press, Pixar Animation
16 Studios, Walt Disney Feature Animation, Walt
Disney Pictures, Disney Enterprises, Inc., and
17 DOES 1 through 100, Inclusive,

18 Defendants.

CASE NO. 07-CV-04392 CW

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEFENDANTS'
MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT AND
DISCOVERY SCHEDULE**

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21 WHEREAS, Plaintiff filed a First Amended Complaint on October 31, 2007;

22 WHEREAS, Defendants filed a Motion to Dismiss Plaintiff's First Amended Complaint on
23 November 15, 2007;

24 WHEREAS, Defendants' Motion to Dismiss Plaintiff's First Amended Complaint is
25 currently scheduled to be heard on December 20, 2007 at 2:00 p.m.;

26 WHEREAS, Plaintiff's counsel is not available on the noticed hearing date, and the parties
27 agreed to continue the hearing on Defendants' Motion to Dismiss Plaintiff's First Amended
28 Complaint to January 31, 2008 at 2:00 p.m.;

1 WHEREAS, the parties have not previously sought a continuance of the hearing date on
2 Defendants' Motion to Dismiss Plaintiff's First Amended Complaint;

3 WHEREAS, the parties further agreed not to undertake discovery in this matter until the
4 Court issues an order resolving Defendants' Motion to Dismiss Plaintiff's First Amended
5 Complaint;

6 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the parties through
7 their counsel of record, that:

- 8 • The hearing on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint
9 is continued to January 31 , 2008 at 2:00 p.m. in this Court;
- 10 • Plaintiff's response to Defendants' Motion to Dismiss Plaintiff's First Amended
11 Complaint and Defendants' reply in support thereof shall be filed in accordance
12 with this Court's Local Rules; and
- 13 • The parties shall not undertake any discovery in this matter until after this Court
14 issues an order on Defendants' Motion to Dismiss Plaintiff's First Amended
15 Complaint.

16
17 DATED: November 21, 2007

ROBINSON & WOOD, INC.

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19 By /s/ Archie S. Robinson

Archie S. Robinson

Attorneys for Plaintiff Deborah J. Thomas

20
21 DATED: November 21, 2007

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

22
23
24 By /s/ Evette D. Pennypacker

Evette D. Pennypacker

Attorneys for Defendants The Walt Disney
Company, Walt Disney Pictures, Disney Book
Group, LLC, Pixar, and Disney Enterprises, Inc.

Order

Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

DATE: _____

United States District Judge

Signature Attestation

I hereby attest that Plaintiff's counsel, Archie S. Robinson, read and agreed to the above
**STIPULATION AND [PROPOSED] ORDER REGARDING DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT AND THE PARTIES'
DISCOVERY SCHEDULE** and gave Quinn Emanuel permission to sign and file the stipulation
on his behalf.

DATED: November 21, 2007

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

By /s/ Evette D. Pennypacker

Evette D. Pennypacker
Attorneys for Defendants The Walt Disney
Company, Walt Disney Pictures, Disney Book
Group, LLC, Pixar, and Disney Enterprises, Inc.